

SPEED, SETA, MARTIN, TRIVETT & STUBLEY, LLC
ATTORNEYS AT LAW

REPLY TO

WALLACE SPEED (GA & TN)
LESLI R. SETA (GA & FL)
SETH C. MARTIN (GA & FL)
ERIC L. TRIVETT (GA)
M. STEPHEN STUBLEY (SC)
STEPHANIE A. ROCKWELL (GA & TN)
JAMES E.L. FICKLING (SC & NC)

114 STONE MOUNTAIN STREET
LAWRENCEVILLE, GEORGIA 30046
PHONE (770) 822-2911
FAX (770) 822-2912
www.Speed-Seta.com

ALEXANDER ADKINS (GA)
HUNTER CHANDLER (GA & TN)
MELISSA CRUZ (GA)
C. BENTON HILBURN (GA)
JASON A. LANAHAN (GA)
ERICA LOUDIN (SC)
ANDREA S. OWEN (GA)
BRITTANY SCHWANITZ (GA)
DANIELLE TAYLOR (GA)
BRITTANY BELL TURNER (GA & FL)

GRANT LANFORD (GA & FL), of counsel
TOM PATTERSON (GA & AL), of counsel
GEORGE GALLAGHER (SC), of counsel
BOB HORNER (SC & NC), of counsel

April 21, 2017

Regional Freedom of Information Officer
U.S. EPA, Region 4
AFC Bldg, 61 Forsyth Street., S.W., 9th Flr (4PM/IF)
Atlanta, GA 30303-8960

RE: Israel DeAza Capellan (deceased) v. PLZ Aeroscience Corp. f/k/a Apollo Technologies and Argo Group (40-198345); SBWC No.: 2017-009727; Claim No.: 668-48-0230; D/A: 12/28/2016

Dear Regional Freedom of Information Officer:

We have been retained to represent PLZ Aeroscience Corporation f/k/a Apollo Technologies and their workers' compensation insurance company, Argonaut Insurance Company, in the workers' compensation claim filed by Carmen Rodriguez on behalf of her deceased husband, Israel DeAza Capellan. Israel DeAza Capellan worked for PLZ Aeroscience Corporation f/k/a Apollo Technologies from January 2016 to the end of October 2016 and they contend that his illness and subsequent death were causally related to his employment.

In order to adequately assess the claim, I need to review **any and all** informational reports regarding environmental violations and citations, and any other relevant information in your files regarding PLZ Aeroscience Corporation f/k/a Apollo Technologies, 1850 S Cobb Industrial Blvd SE, Smyrna, GA 30082, for the entire calendar year of 2016 to present. I am requesting these documents under the Freedom of Information Act. Please provide me with a copy of all of the requested documents as soon as possible.

If your charge for these records will exceed \$100.00, please call me at (770) 822-2911 to discuss this matter before copying the records. Thank you for your consideration of this request.

Sincerely,



Seth C. Martin

SCM/sch